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January 26, 1995

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William F. Caton, Acting Secretary
Federal Communications Commission
1919 M Street, N.W. Rm 222
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Re: ET Docket 93-235, ex parte
Additional Frequencies for Cordless Telephones

Dear Mr. Caton:

On Thursday, January 26, 1995, Dan Bart, Vice President of Technical and Regulatory Affairs at TIA; Jay Padgett, Chairman, Mobile and Personal Communications Division (MPCD) Consumer Radio Section; Jim Haynes, Chairman of Engineering Committee TR-32 Personal Radio Equipment; and Lou Mecseri, Vice-Chairman of the Consumer Radio Section, met with Richard Smith, Chief of OET and Mike Marcus, of his staff, for the purpose of discussing the attached documents relating to ET 93-235.

The participants directed Mr. Marcus' and Mr. Smith's attention to TIA MPCD Consumer Radio Section's Reply Comments to Docket 93-235 which were filed on December 22, 1993 titled "Reply Comments of the TIA Mobile & Personal Communications Consumer Radio Section." The participants also brought TIA ex parte filings dated February 22, 1994, and January 24, 1995 to the attention of the FCC representatives.

Please contact the undersigned if you have any questions regarding this matter.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Dan Bart", written over a horizontal line.

Dan Bart
Vice President, Technical & Regulatory Affairs
Telecommunications Industry Association

Attachments

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ADDITIONAL FREQUENCIES FOR CORDLESS TELEPHONES (ET DOCKET 93-235)

BACKGROUND

- May 1992: PRB and OET identified 15 frequency pairs in PLMRS spectrum near 44/49 MHz suitable for sharing with cordless telephones and invited TIA to discuss them.
- August 1992: TIA filed a Petition for Rule Making requesting the Commission to amend its Rules to allow cordless telephones to use the identified frequencies.
- August 1993: The Commission adopted an NPRM proposing the Rule changes requested by TIA.
- December 1993: Comments and Reply Comments on the NPRM were filed. The major technical issues raised were (1) the potential for interference between cordless and PLMRS operations and (2) the possibility of interference from the 44 MHz (cordless base transmit) frequencies to the intermediate frequency (IF) of TV sets.
- February 1994: Sony filed Supplementary Reply Comments and TIA filed an ex parte letter resolving outstanding technical issues relating to TV interference.

TELECOMMUNICATIONS INDUSTRY ASSOCIATION
Mobile & Personal Communications Consumer Radio Section
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RESOLUTION OF TECHNICAL ISSUES RAISED IN COMMENTS AND REPLY COMMENTS ON THE NPRM

INTERFERENCE FROM CORDLESS TO PLMRS: The effective radiated power (ERP) from a cordless telephone is roughly 20 μ W. TIA demonstrated in its Reply Comments that the interference received by PLMRS from a cordless telephone is small compared to ambient noise and vehicle ignition noise.

INTERFERENCE FROM PLMRS TO CORDLESS: The NPRM proposed a requirement (as suggested by TIA in its Petition) that cordless telephones using the new frequencies include a capability to automatically avoid interference. Cordless telephones would automatically seek channels not used by PLMRS operations.

INTERFERENCE FROM CORDLESS BASE UNITS TO TV SETS: Using TEM cell TV IF susceptibility measurements provided by Zenith in its Reply Comments and a field strength vs. distance curve for the cordless base unit, TIA demonstrated that the cordless base unit would need to be within about 2 feet of the TV set to cause interference. This calculation has been verified by tests performed independently by several TIA members.

SUMMARY

- The new frequencies are desperately needed. With an embedded base of roughly 60 million units and sales of 15 million units per year, the existing 10 channels have long since become saturated in high-density areas. Authorization of the new frequencies is clearly in the public interest.
- The availability of the 902-928 MHz ISM band and the 1.9 GHz "unlicensed PCS" band does not relieve the need for more channels near 49 MHz.
- The interference issues raised by opposing parties (PLMRS and TV interests) have been resolved in the record of the proceeding.
- There is no reason to further delay action in this proceeding. The issues are not complex, and the Commission resources required to bring the proceeding to a successful conclusion should be relatively modest, while the benefits to the public are large.
- FCC resources should be assigned immediately to prepare a Report and Order for the expeditious review and approval by the Commissioners.

QUESTIONS

- In the Commission's view, are there any additional technical issues or questions that need to be addressed by the cordless industry?
- What is the Commission's current position on this proceeding?
- What is the anticipated schedule for the drafting and approval of a Report and Order?
- What, if any, additional information or support does the Commission need from TIA to conclude the proceeding?